

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST  
LITIGATION (NO. II),**

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**Case No. 3:23-md-3071  
MDL No. 3071  
Chief Judge Waverly D. Crenshaw, Jr.  
  
This Document Relates to:  
3:23-CV-00440  
3:23-CV-00326  
3:23-CV-00742**

**MOTION FOR ADMISSION *PRO HAC VICE* OF PATRICK E. BREEN**

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Patrick E. Breen hereby moves for admission to appear *pro hac vice* in the above-captioned action as additional counsel for Defendant Sares Regis Group Commercial, Inc.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Central District of California (Bar number 81579, admitted on March 12, 1979). A Certificate of Good Standing issued by the U.S. District Court for the Central District of California is attached as **Exhibit A**.

2. I am not, nor have I ever been, the subject of disciplinary action by any disciplinary authority, court, or tribunal.

3. I have not been found in contempt by any court or tribunal.

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927.

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal.

6. I have not been charged, arrested, or convicted of a criminal offense or offenses.

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and email address of local counsel retained in this matter:

Beau C. Creson (BPR 032049)  
Sims Funk PLC  
3322 West End Avenue, #200  
Nashville, Tennessee 37203  
Telephone: (615) 292-3995  
[bcreson@simsfunk.com](mailto:bcreson@simsfunk.com)

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in this course of the proceedings.

Respectfully submitted,

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP



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/s/ Gibeault C. Creson

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*Attorneys for Defendant Sares Regis  
Group Commercial, Inc.*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 15th day of February, 2024, pursuant to paragraph 9 of the Court's Practice and Procedures Notice entered April 19, 2023 (ECF No. 2), the foregoing document was electronically filed with the Clerk of Court and served by operation of the Court's electronic filing system upon all parties of record.

/s/ Gibeault C. Creson